

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF PENNSYLVANIA  
Philadelphia Division

Stephanie T. Fryer,

*Debtor.*

Chapter 13  
Case No. 21-11319-AMC

**Motion to Modify Plan After Confirmation**

Debtor Stephanie T. Fryer, through her attorney, moves this Court as follows:

1. The Debtor filed a bankruptcy petition on May 7, 2021. The plan was confirmed on November 18, 2021. The plan is a 100% plan excluding student loans.
2. A stipulation was recently approved between the Debtor and Creditor PNC Mortgage settling the Motion for Relief From Stay (the "Motion") filed at ECF No. 72.
3. The Debtor wants to amend her plan in line with the approved stipulation.
4. The proposed plan rolls in and cures the arrears that gave rise to the Motion by increasing the debtor's monthly plan payments moving forward.
5. The Debtor requests that the Court enter an order approving the plan filed at ECF No. 80 as the new confirmed plan.
6. The Debtor has filed a Supplement to Schedule J as evidence of the Debtor's ability to fund the new plan.

For those reasons, the Court must grant relief in the form of order attached, and further in the Debtor's favor if necessary and proper under the law.

Date: May 1, 2025

CIBIK LAW, P.C.  
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By: 

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